

Center for Nuclear Waste Regulatory Analyses

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CONFIDENTIAL

May 29, 1997
Contract No. NRC-02-96-004
Account No. 20-8265-C03

U.S. Nuclear Regulatory Commission
ATTN: Ms. Deborah A. DeMarco
Program Management, Policy Development, and
Analysis Staff, NMSS
TWFN (Mail Stop 8-A23)
Washington, DC 20555

Subject: Submission of Milestone 8265-003-710, Draft of Standard Review Plan for
In Situ Uranium Mining Source Material License Applications

Dear Ms. DeMarco:

Attached is subject document submitted as a deliverable under Task Order 03 of Nuclear
Regulatory Commission (NRC) Contract No. NRC-02-96-004. An electronic copy of the
deliverable is enclosed for your use. An electronic copy has also been provided to the
NRC project manager, Mr. W. Ford.

The preliminary work on this draft standard review plan (SRP) was carried out under
Task Order 01 of the contract. The Task Order 01 efforts included gathering information
on licensing experience for in situ leach (ISL) uranium mining facilities and
organizing it in a manner that supported efficient development of the individual SRP
sections.

The draft SRP represents efforts by the Center for Nuclear Waste Regulatory Analyses
(CNWRA) to incorporate licensing experience from all relevant sources. The purposes of
the final SRP that will be produced from this draft are to (i) assure the quality and
uniformity of staff reviews of ISL license applications, (ii) present a well-defined
base from which to evaluate proposed changes to the scope and requirements of reviews,
and (iii) make information concerning ISL regulatory matters and the licensing review
process widely available to members of the general public and the uranium mining
industry.

CNWRA considers it appropriate to note the following specific aspects of this draft
SRP:

- (1) Draft SRP chapters vary in level of detail. There is a particularly strong
emphasis on groundwater issues and facility operations. This difference in level
of detail appears to be consistent with Regulatory Guide 3.46, Standard Format
and Content of License Applications, Including Environmental Reports, for In Situ
Uranium Solution Mining.

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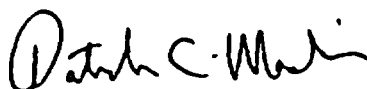
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- (2) The separation of areas of review, acceptance criteria, and review procedures within each SRP section is difficult to achieve. CNWRA staff used a number of existing NRC SRPs as examples for achieving this separation. There appears to be some variance in the way this separation has been achieved throughout the NRC, and CNWRA staff believe the draft SRP provides an appropriate distinction among these portions of the SRP sections.
- (3) The draft SRP is designed to provide the NRC staff with at least one specific approach to compliance determination for each review area, with acceptance criteria that are as technically specific as possible. The SRP also recognizes that applicants and licensees may propose other approaches.
- (4) The draft SRP is written such that it may be applied to license applications, renewals, or amendments.
- (5) Performance-based licensing requirements have been incorporated in the draft SRP.

Throughout the development of this draft SRP, CNWRA collaborated extensively with NRC staff to ensure that appropriate regulatory and technical policy was incorporated. CNWRA staff will continue to work with the NRC PM to respond to NRC comments and any comments generated from public review of the draft SRP, as directed.

Please call me at (210) 522-5054 or Dr. David Turner at (210) 522-2139 if you have any questions concerning this deliverable.

Sincerely yours,



Patrick C. Mackin
Project Manager

PCM/ls
Enclosures

cc:	J. Linehan	D. Neff	CNWRA Directors
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